

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

FEDERICO FLORES, JR.,	§	
MARIA GUERRERO, and	§	
VICENTE GUERRERO,	§	
Plaintiffs,	§	
	§	
	§	CIVIL ACTION NO.7:18-cv-113
	§	
v.	§	
	§	
TEXAS SECRETARY OF STATE and	§	
ARMANDINA MARTINEZ, ALMA	§	
GARCIA, ALICIA DOUGHERTY NO.	§	
1, ALICIA DOUGHERTY NO. 2,	§	
YOLANDA MARTINEZ,	§	
Defendants.	§	

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ORAL DEPOSITION OF

VICENTE GUERRERO

JULY 25, 2019

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ORAL DEPOSITION OF VICENTE GUERRERO, produced as a witness at the instance of the Defendant, and duly sworn, was taken in the above-styled and -numbered cause on the July 25th day of July, 2019, from 12:40 p.m. to 1:23 p.m., before TOI K. DOWELL, CSR, in and for the State of Texas, reported by machine shorthand at the home of Vicente Guerrero and Maria Guerrero, 19 Florez Street, Roma, Texas, 78584 pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

<p>1 APPEARANCES</p> <p>2</p> <p>3 FOR THE PLAINTIFFS:</p> <p>4</p> <p>5 Ms. Marty Vela</p> <p>6 NAJVAR LAW FIRM</p> <p>7 2180 North Loop West, Suite 255</p> <p>8 Houston, Texas 77018-8014</p> <p>9 Phone (281) 404-4696</p> <p>10 Email: jerad@najvarlaw.com</p> <p>11 FOR THE DEFENDANTS:</p> <p>12 Mr. Michael R. Abrams</p> <p>13 ASSISTANT ATTORNEY GENERAL</p> <p>14 Office of the Attorney General-019</p> <p>15 General Litigation Division</p> <p>16 Post Office Box 12548, Capitol Station</p> <p>17 Austin, Texas 78711-2548</p> <p>18 Phone: (512)463-2120</p> <p>19 Email: michael.abrams@oag.texas.gov</p> <p>20</p> <p>21 Mr. Jose Garza</p> <p>22 GARZA GOLANDO MORAN</p> <p>23 405 North Saint Mary's Street, Suite 700</p> <p>24 San Antonio, Texas</p> <p>25 Phone: (210)892-8543</p> <p>26 Email: garzapalm@aol.com</p> <p>27 ALSO PRESENT: Nelson Troncoso, Interpreter</p> <p>28 Mrs. Maria Guerrero</p>	<p>4</p> <p>1 (Interpreter Sworn.)</p> <p>2 VICENTE GUERRERO,</p> <p>3 having been first duly sworn, testified as follows:</p> <p>4 EXAMINATION</p> <p>5 BY MR. ABRAMS:</p> <p>6 Q Good afternoon, sir.</p> <p>7 A Good afternoon.</p> <p>8 Q My name is Michael Abrams, and I represent the</p> <p>9 Texas Secretary of State in this lawsuit.</p> <p>10 Sir, could you please state your name for the</p> <p>11 record.</p> <p>12 A Vicente Guerrero.</p> <p>13 Q Mr. Guerrero, how old are you?</p> <p>14 A Well, I was born on August 11th, 1935. So I'm</p> <p>15 80-something years old; 83 or 84, that's my age. I'm old</p> <p>16 already.</p> <p>17 Q I'm just a little younger, but not very much.</p> <p>18 Mr. Guerrero, have you ever been deposed before?</p> <p>19 A No. No.</p> <p>20 Q So I just want to go over some of the ground rules</p> <p>21 for how depositions work so that this can go smoothly.</p> <p>22 A Okay.</p> <p>23 Q So if you could, please give a verbal answer to my</p> <p>24 questions rather than shaking your head. That way the court</p> <p>25 reporter can get a clear record.</p>
<p>3</p> <p>1 INDEX</p> <p>2</p> <p>3 Appearances..... 2</p> <p>4 VICENTE GUERRERO</p> <p>5 Examination by Mr. Abrams..... 4</p> <p>6 Examination by Mr. Garza..... 14</p> <p>7 Examination by Ms. Vela..... 18</p> <p>8 Changes and Signature Page..... 21</p> <p>9 Reporter's Certificate..... 23</p> <p>10 EXHIBITS</p> <p>11 NO. DESCRIPTION PAGE</p> <p>12 1 Declaration 10</p> <p>13 2 Notice of Rejected Ballot 13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>5</p> <p>1 And that goes to actually a second thing. Because</p> <p>2 the court reporter is taking everything down, we would</p> <p>3 appreciate it if you could wait until the translator has</p> <p>4 finished translating my question before you start your</p> <p>5 answer; and in turn, I will wait until you're completely</p> <p>6 finished before I ask my next question.</p> <p>7 Is that okay?</p> <p>8 A Yes. Agree, yes.</p> <p>9 Q And do you understand that you have taken an oath,</p> <p>10 and it is the same oath that you would be taking in a court</p> <p>11 of law?</p> <p>12 A The same as in a court, yes.</p> <p>13 Q I don't think that this deposition will go very</p> <p>14 long; but if for any reason you need to take a break, please</p> <p>15 let me know, and we'll find the time to make sure you can</p> <p>16 take a break.</p> <p>17 Have you ingested anything or taken any medication</p> <p>18 that would prevent you from answering my questions this</p> <p>19 afternoon and understanding my questions?</p> <p>20 A No.</p> <p>21 MRS. GUERRERO: (Through the interpreter) You</p> <p>22 did take some medication, but you're saying no.</p> <p>23 A Yes, I did take some medication; but, I mean, I'm</p> <p>24 going to be speaking the truth. So that's it, and I might</p> <p>25 say something else.</p>

<p>6</p> <p>1 Q (By Mr. Abrams) Okay. And the medication doesn't</p> <p>2 prevent you from understanding my questions or being able to</p> <p>3 give honest answers, correct?</p> <p>4 A No, no, no, no.</p> <p>5 Q Okay. Mr. Guerrero, what did you do to prepare for</p> <p>6 today's deposition?</p> <p>7 A No, nothing. I know this has to do with what I</p> <p>8 signed; my signature. That's it. That's the only thing.</p> <p>9 Q Okay. Did you speak with anyone prior to today's</p> <p>10 deposition?</p> <p>11 A No, no one.</p> <p>12 Q And did you review any documents before your</p> <p>13 deposition?</p> <p>14 A No. Just that letter that I got, and I signed it,</p> <p>15 and that's it.</p> <p>16 Q Just to clarify, what letter are you referring to?</p> <p>17 A When they send me that paper to vote.</p> <p>18 Q Are you referring to your application?</p> <p>19 A Yes, when I signed it. That's it.</p> <p>20 Q So you reviewed your ballot application before</p> <p>21 today's deposition?</p> <p>22 A No, no. I mean the ballot was the only thing I</p> <p>23 signed, and that's it.</p> <p>24 Q Do you have the document with you that you</p> <p>25 reviewed?</p>	<p>8</p> <p>1 Since I became a citizen.</p> <p>2 Q And have you ever voted in person?</p> <p>3 A In person? Yes, one time; but that's it.</p> <p>4 Q Okay. And so for the rest of the time that you</p> <p>5 vote, do you -- how do you vote?</p> <p>6 A No. That's it. That's the only time I voted. It</p> <p>7 was just that time. I have not voted. It was just that one</p> <p>8 time that I voted. That's it.</p> <p>9 Q So just to make sure I understand, you have only</p> <p>10 voted in the United States -- let me scratch that and start</p> <p>11 over.</p> <p>12 How many times have you voted in an election in</p> <p>13 Starr County?</p> <p>14 A I don't remember, but I have voted before. I don't</p> <p>15 remember how many times, but I have voted already.</p> <p>16 Q Would you say you voted more than five times in the</p> <p>17 past?</p> <p>18 A Maybe. I mean, I voted for the presidents and --</p> <p>19 and others.</p> <p>20 Q Do you recall submitting an application to vote by</p> <p>21 mail in the 2018 democratic primary elections?</p> <p>22 A No. Just that one in person. I go to the court,</p> <p>23 and I signed there. We're talking about the presidential</p> <p>24 elections, when those take place.</p> <p>25 Q So just to -- I'm not quite sure I'm understanding</p>
<p>7</p> <p>1 A I don't think we have it, right? No, no. It's</p> <p>2 been a long time already.</p> <p>3 Q Mr. Guerrero, how long have you lived in Starr</p> <p>4 County?</p> <p>5 A Just a very short period of time. Since 1966.</p> <p>6 Q Okay. And Mr. Guerrero, are you a United States</p> <p>7 citizen?</p> <p>8 A I became a U.S. citizen, yes.</p> <p>9 Q When did you become a U.S. citizen?</p> <p>10 (Witness asks Mrs. Guerrero.)</p> <p>11 MR. GARZA: He can't ask her. If he doesn't</p> <p>12 remember, he doesn't remember.</p> <p>13 A Oh, okay. Okay. I don't remember since when.</p> <p>14 Q (By Mr. Abrams) Okay. Has it been at least since</p> <p>15 -- have you been a U.S. citizen since at least 2000?</p> <p>16 A Yes. I think I've been a citizen for 20 years now.</p> <p>17 Maybe more, but we'll go with 20.</p> <p>18 Q Mr. Guerrero, are you registered to vote in Starr</p> <p>19 County?</p> <p>20 A Yes.</p> <p>21 Q And how long have you been voting in Starr County?</p> <p>22 A I've been voting for a long time already. It's</p> <p>23 been years.</p> <p>24 Q How long?</p> <p>25 A It's been -- I've been voting for a long time.</p>	<p>9</p> <p>1 when you voted in the -- when you have voted in the past, do</p> <p>2 you vote -- do you go in person to submit your ballot, or do</p> <p>3 you submit a ballot in the mail?</p> <p>4 A Okay. It was just that one time that I did it by</p> <p>5 mail. The rest has been in person.</p> <p>6 I went in person to submit my vote. They present</p> <p>7 me with that ballot, and that's where I vote. That's where</p> <p>8 I -- where I sign my name.</p> <p>9 Q Do you intend to vote in future elections?</p> <p>10 A If I can, yes, I'll submit my vote.</p> <p>11 Q Okay. And for those --</p> <p>12 A The -- the thing is that sometimes they schedule me</p> <p>13 for an appointment, and that's when I go and vote in person.</p> <p>14 Q So for future elections, do you intend to vote in</p> <p>15 person or by mail?</p> <p>16 A I'm not going to do it by mail anymore. Not by</p> <p>17 mail, no.</p> <p>18 Q So you --</p> <p>19 A I'd rather go in person.</p> <p>20 Q So in future elections, your intent is to go vote</p> <p>21 in person?</p> <p>22 A I'll go in person. I've gone -- I have gone in</p> <p>23 person all the time.</p> <p>24 Q And your intention is in the future to go in</p> <p>25 person?</p>

<p>10</p> <p>1 A Yes. Yes, in person. Not by mail anymore, no.</p> <p>2 Q Okay. Mr. Guerrero, I'd like to show you what</p> <p>3 we'll mark as Exhibit 1 for your deposition.</p> <p>4 (V. Guerrero Exhibit No. 1 was marked.)</p> <p>5 A This is my signature right here (indicating).</p> <p>6 Q (By Mr. Abrams) And I'll represent that this is a</p> <p>7 Declaration that you provided in this matter in which you</p> <p>8 attach your Declaration -- or you attach your copy of the</p> <p>9 Application to Vote by Mail and a copy of the envelope for</p> <p>10 your ballot for the March 2018 primary elections.</p> <p>11 Do you recognize this Declaration?</p> <p>12 A No. I used to read a lot. But, no, this is my</p> <p>13 signature.</p> <p>14 Q Did you -- do you see the bullet points, the types</p> <p>15 -- the information in Paragraphs 1 through 3?</p> <p>16 A Yes.</p> <p>17 Q Did you write that?</p> <p>18 A This? I don't even know what it says here. I</p> <p>19 don't know either.</p> <p>20 Q Okay. I'd like for you to turn to the next page of</p> <p>21 Exhibit 1, please. Thank you.</p> <p>22 A Okay.</p> <p>23 Q And I'll represent that this is an Application for</p> <p>24 Ballot by Mail, and I'd like for you to look at the box</p> <p>25 No. 10.</p>	<p>12</p> <p>1 her why. We asked her why, if we signed the proper way.</p> <p>2 Those were our signatures.</p> <p>3 Q And when you say the woman, do you recall who that</p> <p>4 was who told you that the application was rejected?</p> <p>5 A My wife. I'm talking about my wife.</p> <p>6 Q Okay. So your wife was the one who told you?</p> <p>7 A Yes to your question, but they approached her.</p> <p>8 They came to her, and then they told her that we had been</p> <p>9 rejected. We questioned why. Those were our signatures.</p> <p>10 Q So at the same time that your wife learned that her</p> <p>11 ballot had been rejected, you also learned that your ballot</p> <p>12 had been rejected; is that correct?</p> <p>13 A Yes. We found out, and we ask why, and this is our</p> <p>14 signature.</p> <p>15 Q After you found out that your ballot application</p> <p>16 for the March 2018 primary had been rejected, did you speak</p> <p>17 with anyone in the Starr County election office about your</p> <p>18 rejected ballot?</p> <p>19 A No, no one. No.</p> <p>20 Q Did you speak with anyone in John Rodriguez's</p> <p>21 office after you learned that your ballot application had</p> <p>22 been rejected?</p> <p>23 A No. No one knew.</p> <p>24 Q Did you speak with anyone in the Texas Secretary of</p> <p>25 State's office?</p>
<p>11</p> <p>1 Is this your signature in box 10?</p> <p>2 A That is my signature.</p> <p>3 Q Okay. And I'd like for you to turn to the last</p> <p>4 page of Exhibit 1. And I'll represent that this is an</p> <p>5 envelope for your application.</p> <p>6 And is that your signature on this envelope?</p> <p>7 A Right here, Vicente Guerrero (indicating).</p> <p>8 Q Okay. Do you recall signing these two signatures?</p> <p>9 A Yes. Yes, these are my signatures.</p> <p>10 Q Okay. Did you -- once you signed the envelope, did</p> <p>11 you mail the ballot yourself, or did someone mail the ballot</p> <p>12 application for you?</p> <p>13 A We send it by mail.</p> <p>14 Q Mr. Guerrero, did you ever receive a notification</p> <p>15 that your application -- that your ballot had been rejected?</p> <p>16 A No.</p> <p>17 Q Okay. Did you ever learn, at any point, that this</p> <p>18 ballot application, which is in Exhibit 1, had been</p> <p>19 rejected?</p> <p>20 A Later we found out that it had been rejected, and I</p> <p>21 don't know why. I mean, we voted. We had our signatures;</p> <p>22 my wife's signature.</p> <p>23 Q How did you learn that your application had been</p> <p>24 rejected?</p> <p>25 A The lady told us. The lady told us. Then we asked</p>	<p>13</p> <p>1 A No, no one.</p> <p>2 Q Okay. So just -- you did not speak with anyone</p> <p>3 after learning that your ballot application had been --</p> <p>4 A I had signed for it, I send it, and that was it.</p> <p>5 With no one, no.</p> <p>6 Q Let me make sure -- just to make sure we get a</p> <p>7 clear record.</p> <p>8 So you did not speak with anyone after learning</p> <p>9 that your ballot had been rejected?</p> <p>10 A With no one. No, with no one.</p> <p>11 Q I'd like to show you what we'll mark as Exhibit 2.</p> <p>12 (V. Guerrero Exhibit No. 2 was marked.)</p> <p>13 Q (By Mr. Abrams) And I'll represent this is a</p> <p>14 Notice of Rejected Ballot with -- regarding your ballot</p> <p>15 application.</p> <p>16 Do you recall ever receiving this document?</p> <p>17 A No, no.</p> <p>18 Q Okay. Have you seen this document before today?</p> <p>19 A No, I had not seen anything.</p> <p>20 Q Mr. Guerrero, have you understood the questions</p> <p>21 that I've asked today?</p> <p>22 A Yes.</p> <p>23 Q And have I been courteous with you today?</p> <p>24 A Very well, thank you.</p> <p>25 MR. ABRAMS: We pass the witness.</p>

<p style="text-align: right;">14</p> <p>1 EXAMINATION</p> <p>2 BY MR. GARZA:</p> <p>3 Q Good afternoon. My name is Jose Garza, and I</p> <p>4 represent Armandina Martinez, Alma Garcia, Alicia Dougherty,</p> <p>5 Alicia Dougherty No. 2, and Yolanda Martinez.</p> <p>6 THE INTERPRETER: The second one.</p> <p>7 (Counsel shows the interpreter document with</p> <p>8 Defendants' names.)</p> <p>9 Q (By Mr. Garza) Do you know Armandina Martinez?</p> <p>10 A No. I don't know anyone.</p> <p>11 Q Did you ever tell Armandina Martinez who you were</p> <p>12 going to vote for in 2018?</p> <p>13 A No, I did not mention anything to her, no.</p> <p>14 Q And is there any reason Ms. Martinez --</p> <p>15 A And since your vote is confidential, you cannot</p> <p>16 mention it to anyone. They tell us that when we -- they</p> <p>17 tell you not to tell anyone, no, that you voted for such</p> <p>18 person. So --</p> <p>19 Q And the same thing is true as to Alma Garcia and</p> <p>20 Alicia Dougherty No. 1, and Alicia Dougherty No. 2, and</p> <p>21 Yolanda Martinez; is that correct?</p> <p>22 THE INTERPRETER: Alma Martinez?</p> <p>23 MR. GARZA: Alma Garcia, Alicia Dougherty</p> <p>24 No. 2.</p> <p>25 A No one.</p>	<p style="text-align: right;">16</p> <p>1 bottom of the page?</p> <p>2 A No.</p> <p>3 Q Do you know who Ms. Vela is?</p> <p>4 A No. I don't know anyone.</p> <p>5 Q Okay.</p> <p>6 A They just give me the ballot; I go over to the</p> <p>7 ballot box; I sign; and I just put in the box; and that's</p> <p>8 it.</p> <p>9 I don't know who those people are.</p> <p>10 Q Okay. Mr. Guerrero, can you read what the name is</p> <p>11 at the bottom of the page?</p> <p>12 A It says "Roma." No. Okay.</p> <p>13 Q Let's turn to the last page.</p> <p>14 A Like I said, I don't know anyone. They just give</p> <p>15 me the ballot. I sign it, and put in the back, and I take</p> <p>16 off.</p> <p>17 Q Let's turn to the last page.</p> <p>18 A There's my signature right there (indicating).</p> <p>19 Q And at the bottom of the page, Mr. Guerrero, there</p> <p>20 is the name of another person.</p> <p>21 Can you read that for us?</p> <p>22 A It was right here, Vicente Guerrero. Somebody</p> <p>23 wrote it down there. My signature is this one over here</p> <p>24 (indicating).</p> <p>25 Q I'm sorry. But -- and I apologize for going over</p>
<p style="text-align: right;">15</p> <p>1 Q (By Mr. Garza) Do you know any reason why they</p> <p>2 know who you had voted for?</p> <p>3 MS. VELA: Objection, form.</p> <p>4 A I don't know how they would know. I mean, I just</p> <p>5 grabbed my ballot, I vote, I put my signature.</p> <p>6 I'm not going around telling anyone who I voted</p> <p>7 for.</p> <p>8 Q (By Ms. Garza) Thank you. And you mentioned that</p> <p>9 you don't know who Armandina Martinez is.</p> <p>10 Do you know Alma Garcia?</p> <p>11 A No, I don't know. I don't even know who they are.</p> <p>12 I mean, I just show up there; they give me the ballot; I</p> <p>13 sign; I vote and that's it.</p> <p>14 I don't know what -- who they are looking for.</p> <p>15 Q So let me call your attention to Exhibit No. 1 that</p> <p>16 Mr. Abrams gave you. And if you could turn to the second</p> <p>17 page.</p> <p>18 A This is my signature right here (indicating).</p> <p>19 Q Okay. If you can look at the bottom of that page,</p> <p>20 do you see a signature there?</p> <p>21 A Not here, no. But this is my signature over here</p> <p>22 (indicating).</p> <p>23 Q Yes, Mr. Guerrero. I'm not talking about your</p> <p>24 signature.</p> <p>25 Do you see that there is another signature at the</p>	<p style="text-align: right;">17</p> <p>1 this with you, Mr. Guerrero. But I just want to know,</p> <p>2 there's a person listed on that first line, and I just want</p> <p>3 to know if you can read that.</p> <p>4 A No.</p> <p>5 Q No.</p> <p>6 A No. I don't know anyone.</p> <p>7 Q Okay. Did somebody help you with your ballot when</p> <p>8 you voted in the primary of 2018?</p> <p>9 A No one. No -- I go in myself; I vote. I mean, no</p> <p>10 one is telling me "Vote for this person" or the other, this</p> <p>11 or that.</p> <p>12 If I like that person, I'll vote for that person.</p> <p>13 That's it.</p> <p>14 Q Did anybody help you read the 2018 ballot?</p> <p>15 A No. I know more or less what it says there. No</p> <p>16 one needs to tell me anything. I see the names there. I</p> <p>17 know more or less who I'm going to vote for, and that's it.</p> <p>18 No one tells me who to vote for.</p> <p>19 Q So let me just tell you that on your ballot</p> <p>20 envelope, the third page of your -- of Exhibit No. 2 -- of</p> <p>21 Exhibit No. 1 is the name of Barbara Barrios.</p> <p>22 Do you know who Barbara Barrios is?</p> <p>23 THE INTERPRETER: (Through the witness) Do you</p> <p>24 want a soda?</p> <p>25 MR. ABRAMS: It's okay. Thank you.</p>

<p>18</p> <p>1 A No, no. I don't even know these people. As for 2 example, this lady right here, I'm looking at her; I'm not 3 gonna be asking her for her name, who she is, or what her 4 name is. 5 Q (Mr. Garza) And on the prior page, it says 6 "Modesta Vela." 7 Do you know who Modesta is? 8 A No one. No, I don't know anyone. No one. 9 Q And in the May 2018 -- I'm sorry -- the March 2018 10 primary, when -- did these people that came to your house, 11 did they bring you the ballot? 12 MS. VELA: Objection, form. 13 (Witness looks to Mrs. Guerrero) 14 Q (By Mr. Garza) You can't ask. If you can remember 15 -- if you can't remember, that's fine. 16 A No, I don't remember. I don't remember. 17 Q Okay. 18 MR. GARZA: I don't have any other questions 19 for Mr. Guerrero. 20 MS. VELA: I have a few questions. 21 EXAMINATION 22 BY MS. VELA: 23 Q And Mr. Guerrero, how old are you? 24 A Eighty-three or eighty-four. 25 Q And what is your address?</p>	<p>20</p> <p>1 mail? No. I rather go to the ballot box. I'll be there, 2 and I'll do it there. 3 Q So the fact that your vote was rejected has 4 influenced your decision to no longer vote by mail? 5 MR. GARZA: Objection, form. 6 A I'm not voting by mail, no. 7 MS. VELA: That's all I have. Thank you. 8 MR. ABRAMS: We have no further questions. 9 MR. GARZA: No further questions. 10 (Deposition concluded at 1:23 p.m.) 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p>19</p> <p>1 A 19 Florez Street in Roma, Texas. 2 Q And do you receive your mail at that address? 3 A Yes, I have my mail here. 4 Q Do you usually sit outside and receive the mail? 5 A Sometimes I am. I'm sure not. Sometimes I do go 6 outside, just to be resting outside. 7 Q But your mail is delivered to this home? 8 A Yes, at this home. 9 MS. VELA: And for the record, we are at 10 the address that he just listed taking this deposition. 11 Q (By Ms. Vela) Mr. Guerrero, do you understand that 12 there is nothing wrong with voting by mail? 13 A Well, I mean, you know, now we have this big 14 problem because I voted by mail; but I don't think I'm 15 going to be voting by mail. I mean, it got -- it led to all 16 of this. So I rather just go to the ballot box. 17 Q I understand. But my question is, do you know you 18 have the right -- the legal right to vote by mail? 19 A Yes, I know I have rights. But I'm not, no. 20 Q And if the law allows you -- 21 A No. 22 Q If the law allows you to be assisted when voting by 23 mail, would you allow your wife or your daughter to assist 24 you and vote by mail? 25 A No, no. After this experience, am I voting by</p>	<p>21</p> <p>1 CHANGES AND SIGNATURE 2 WITNESS NAME: _____ DATE OF DEPOSITION: _____ 3 PAGE LINE CHANGE REASON 4 _____ 5 _____ 6 _____ 7 _____ 8 _____ 9 _____ 10 _____ 11 _____ 12 _____ 13 _____ 14 _____ 15 _____ 16 _____ 17 _____ 18 _____ 19 _____ 20 _____ 21 _____ 22 _____ 23 _____ 24 _____ 25 _____</p>



<p>22</p> <p>1 I, VICENTE GUERRERO, have read the foregoing  2 deposition and hereby fix my signature that same is true and  3 correct, except as noted above.  4  5 _____  6 VICENTE GUERRERO  7 STATE OF _____)  8 COUNTY OF _____)  9 Before me, _____, on this day personally  10 appeared VICENTE GUERRERO, known to me (or proved to me  11 under oath or through _____) to be the person whose  12 name is subscribed to the foregoing instrument and  13 acknowledged to me that they executed the same for the  14 purposes and consideration therein expressed.  15 Given under my hand and seal of office this _____  16 day of _____, _____.  17  18  19  20 NOTARY PUBLIC IN AND FOR  21 THE STATE OF _____  22  23  24  25</p>	<p>24</p> <p>1 the completion of the deposition.  2 I further certify that I am neither counsel for, related  3 to, nor employed by any of the parties to the action in  4 which this proceeding was taken, and further that I am not  5 financially or otherwise interested in the outcome of the  6 action.  7 Subscribed and sworn to on this the 29th day of July,  8 2019  9  10 _____  11 Toi K. Dowell, CSR No. 2768  12 Certified Expires 12/31/2019  13 Integrity Legal Support Solutions  14 Firm Registration No. 528  15 PO Box 245  16 Manchaca, TX 78652  17 (512)320-8690  18 (512)320-8692 (fax)  19  20  21  22  23  24  25</p>
<p>23</p> <p>1 IN THE UNITED STATES DISTRICT COURT  2 SOUTHERN DISTRICT OF TEXAS  3 MCALLEN DIVISION  4 FEDERICO FLORES, JR., §  5 MARIA GUERRERO, and §  6 VICENTE GUERRERO, §  7 Plaintiffs, §  8 §  9 § CIVIL ACTION NO.7:18-cv-113  10 §  11 v. §  12 §  13 TEXAS SECRETARY OF STATE and §  14 ARMANDINA MARTINEZ, ALMA §  15 GARCIA, ALICIA DOUGHERTY NO. §  16 1, ALICIA DOUGHERTY NO. 2, §  17 YOLANDA MARTINEZ, §  18 Defendants. §  19 REPORTER'S CERTIFICATE  20 ORAL DEPOSITION OF VICENTE GUERRERO  21 JULY 25, 2019  22 I, Toi K. Dowell, certified shorthand reporter in and  23 for the State of Texas, hereby certify to the following:  24 That the witness VICENTE GUERRERO was duly sworn by the  25 officer and that the transcript of the deposition is a true  record of the testimony given by the witness;  I further certify that pursuant to the FRCP Rule  30(f)(1) that the signature of the Deponent  X was requested by the deponent or a party before the  completion of the deposition and returned within 30 days  from date of receipt of the transcript. If returned, the  attached Changes and Signature Page contains any changes and  the reasons therefore;  _____ was not requested by the deponent or a party before</p>	